

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
LIGADO NETWORKS LLC)	IB Docket No. 11-109
)	IB Docket No. 12-340
Modification Applications)	

REPLY COMMENTS

Inmarsat Inc. (“Inmarsat”) hereby responds to the record compiled with respect to the above-referenced applications of Ligado Networks LLC (“Ligado”)¹ to modify the ancillary terrestrial component (“ATC”) of its L-band mobile satellite service networks (the “Modification Applications”). Inmarsat supports grant of the Modification Applications.

The public interest is well-served when parties develop constructive solutions to spectrum controversies, thereby making it possible for spectrum to be used efficiently and effectively. Ligado’s Modification Applications, the associated agreements Ligado has entered into with GPS manufacturers, and Ligado’s ongoing efforts and commitments to address interference concerns, reflect just such a constructive solution.²

Inmarsat is keenly interested in this proceeding. It employs L-Band spectrum to provide critical services and capabilities to users in the maritime, aviation, military, public safety, media, energy, and other sectors. Inmarsat and Ligado have negotiated an inter-operator Cooperation

¹ Consistent with the Commission’s *Public Notice* seeking comment on the Applications, we use the term “Ligado” to refer to New LightSquared LLC and its subsidiary, LightSquared Subsidiary LLC, as Ligado was formerly known. See “Comment Sought on Ligado’s Modification Applications,” *FCC Public Notice*, DA 16-442 (Apr. 22, 2016), at n.1.

² See Ligado Comments, IB Docket 11-109 and 12-340 (May 23, 2016).

Agreement that paves the way for Ligado to develop its L-band ATC network while allowing Inmarsat to continue providing services and innovating in the L-Band.

Inmarsat supported previous Ligado proposals, which included having Ligado voluntarily relinquish rights to deploy terrestrial downlink operations in the 1545-1555 MHz downlink portion of the L-Band in order to address questions that arose about the compatibility of GPS receivers and Ligado's operations.³ Through its latest proposals, which add significant power reductions and other operational restrictions agreed to between Ligado and key GPS manufacturers, Ligado has demonstrated its commitment to collaborating with all affected parties and working to address all serious concerns. The Ligado-GPS settlement agreements resolve many of the issues that have been outstanding, as reflected in the supportive comments filed by some GPS interests.⁴ This positive engagement toward identifying mutually agreeable solutions should be a model for resolving any additional technical concerns related to Ligado's proposals.

Some parties have raised concerns about the potential impact of Ligado's proposals on Inmarsat terminals. Inmarsat has been working with manufacturers, customers, and Ligado to reduce the potential for interference to Inmarsat users. Inmarsat has undertaken significant work to develop solutions to make terminals capable of coexisting with Ligado's ATC operations. For example, many new terminals installed since 2012 have incorporated designs developed by Inmarsat and its terminal manufacturers to permit Inmarsat users to operate effectively with Ligado's ATC network in adjacent spectrum. Inmarsat continues to work with its manufacturers to provide and distribute terminals that will be resilient to Ligado ATC.

³ See *Comments of Inmarsat*, LightSquared Request to Modify its ATC Authorization, IB Docket 12-340 (Dec 17, 2012).

⁴ See *Comments of Trimble Navigation*, IB Docket 11-109 and 12-340 (May 23, 2016), at 1-2; *Comments of TopCon Positioning Systems*, IB Docket 11-109 and 12-340 (May 23, 2016), at 2.

Ligado has made numerous and substantial modifications to its ATC system to accommodate the legitimate concerns of the GPS community, Inmarsat and others. We are confident that any remaining issues can be addressed through industry cooperation. In the meantime, the Commission should act promptly on Ligado's Modification Applications.

Inmarsat commends all parties whose efforts have helped get us this far, and Inmarsat continues to support collaboration aimed at achieving a successful conclusion.

Respectfully submitted,

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June 21, 2016